



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

May 24, 2006

Certified Mail No. 7005 1160 0000 1550 3994

Steve Linton
Tri-Pro Cedar Products, Inc.
1122 Highway 2
Oldtown, Idaho 83822

RE: Facility ID No. 017-00006, Tri-Pro Cedar Products, Incorporated, Oldtown
Final Tier II Operating Permit Letter

Dear Mr. Linton:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-050126 for the Tri-Pro Cedar Products, Inc. facility located at Oldtown, in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed Tier II operating permit is based on the information contained in your permit application. This Tier II permit is effective immediately and replaces Tier II Operating Permit No. T2-020114, issued September 5, 2003, the terms and conditions of which shall no longer apply. Please note that this permit expires five years after the issuance date.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Dan Redline of the Coeur d'Alene Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

In accordance with IDAPA 58.01.01.407, DEQ has assessed the emissions for this permit and determined that a Tier II processing fee of \$500 will be due. The fee was received by DEQ on November 18, 2005.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/REB/bf Permit No. T2-050126

Enclosure

c: **Dan Redline, Coeur d'Alene, Regional Office**
 Robert Baldwin, Permit Writer
 Bill Rogers, Permit Coordinator
 Marilyn Seymore/Pat Rayne, Air Quality
 Laurie Kral, EPA Region 10
 Source File
 Permit Binder
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
TIER II OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-050126

FACILITY ID NO.: 017-00006

AQCR: 063

CLASS: SM

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 497.3, 5337.5

1. PERMITTEE

Tri-Pro Cedar Products, Inc.

2. PROJECT

Facility-wide Tier II Operating Permit Revision

3. MAILING ADDRESS

1122 Highway 2

CITY

Oldtown

STATE

ID

ZIP

83822

4. FACILITY CONTACT

Steve Linton

TITLE

Operations Manager

TELEPHONE

(208) 437-2412

5. RESPONSIBLE OFFICIAL

Steve Linton

TITLE

Operations Manager

TELEPHONE

(208) 437-2412

6. EXACT PLANT LOCATION

Adjacent to Highway 2, two miles west of Albeni Falls

COUNTY

Bonner

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sawmill and Planing Mill of Softwoods

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

September 5, 2003

Date Modified/Revised

May 24, 2006

Date Expires:

September 5, 2008

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Acronyms, Units, And Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
ft ³ /unit	cubic feet per unit
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
°F	degrees Fahrenheit
ft	feet
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act.
km	Kilometer
lb/day	pounds per day
Mbf	million board feet
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf/min	standard cubic feet per minute
SIC	Standard Industrial Classification
SM	Synthetic Minor
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-050126

Permittee:	Tri-Pro Cedar Products, Inc.	Facility ID No. 017-00006	Date Issued:	September 5, 2003
Location:	Oldtown, Idaho		Date Modified/Amended:	May 24, 2006
			Date Expires:	September 5, 2008

1. TIER II OPERATING PERMIT SCOPE

Purpose

- 1.1 The permit is a revision of the facility's existing Tier II operating permit. Specifically, this permit revision removes the short-term hours of operation restriction for the process equipment cyclones from the permit. Modeling predicts that emissions from the cyclones will not cause or contribute to violation of the PM₁₀ NAAQS on either a short-term or long-term basis. Removal of the restriction does not result in an increase of emissions because emissions are inherently limited by a throughput limit.
- 1.2 This Tier II operating permit supersedes the following permits:
- Tier II permit T2-020114, issued September 5, 2003
 - PTC No. 017-00006, issued December 17, 2001
 - All previous PTCs issued at this facility before December 17, 2001
 - Operating Permit No. 0240-0006-002, issued on August 5, 1993

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit:

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Sections	Source Description	Emissions Control(s) ^a
3	<u>Sawmill Processes</u> Building: Sawmill Annual input: 270,000 tons logs potential Annual product output/permited production: 90,000 Mbf green lumber Annual byproduct output: 21,168 tons of sawdust Annual byproduct output: 35,280 tons of chips	Indoor with pneumatic dust pickup
3	<u>Lumber Dry Kilns</u> Building: Dry kiln building Type: Electric dehumidification kilns Permitted throughput: 90,000 Mbf of green lumber per any consecutive 12-month period Vent: through 2 horizontal vents. Vent height: 20 ft Vent exit temperature: 70 °F	None
4	<u>Sawdust Bin Loadout</u> 21,168 tons of sawdust potential	None
	<u>Chip Truck Bin Loadout</u>	None
4	<u>Shavings Truck Bins Loadout</u> 20,000 tons of shavings	Sides sheltered by wooden walls
4	<u>Fuel Bin (silo) Shavings Loadout</u>	Loadout at ground level and are sheltered from the wind by the structure of the bins ^b
	<u>Fuel Bin Hog Fuel Storage (vertical tank bin) Loadout</u>	None
	<u>Planer Chipper (Cyclone #5 Loadout to Trucks)</u> 10,800 tons of planer chips potential	None

^a Cyclones function primarily as process equipment and to some extent as control devices.

^b Emissions from fuel bin shavings loadout are included in Shavings Truck Bins and Fuel Bin Hog Fuel Storage loadout emissions estimation

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Table 1.2 identifies all other air pollution-emitting sources at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

Table 1.2 OTHER AIR POLLUTION SOURCES

Source Description
<u>Propane-fired Boiler</u> Building: Steam plant building Manufacturer: Cleaver Brooks Rated heat input capacity: 7.87 MMBtu/hr Burner type: propane burner Stack height: 40 ft Stack exit diameter: 2.5 ft Stack exit gas flowrate: 2,400 acfm Stack Exit temperature: 350 °F
<u>Log Yard</u> <u>Debarking:</u> Annual rate: 270,000 tons logs
<u>Bark Hog</u> Annual rate: 25,506 tons bark
<u>Sawmill Chipper</u> 35,280 tons of chips potential Control: indoor
<u>Sawmill Screen</u> 35,280 tons of chips potential Control: indoor
Planer processes Building: Planer building Annual input: 90,000 Mbf dry lumber Annual product output: 90,000 Mbf planed lumber Annual byproduct output: 10,800 tons of planer chips Annual byproduct output: 20,000 tons of shavings Control: indoor with pneumatic dust pickup
<u>Planer Hog</u> 10,800 tons of planer chips potential
<u>Planer Screening</u> 10,800 tons of planer chips potential Control: indoor
<u>Sawdust Bin Loading</u> 21,168 tons of sawdust potential
<u>Chip Truck Bin Loading</u> Storage capacity: 45 units, 200 ft ³ /unit Control: target box
<u>Shavings Truck Bins Loading</u> Storage capacity: 45 units, 200 ft ³ /unit Control: #2 or #7 Shavings Bin Cyclones #4 Trimmer Bin Cyclone
<u>Fuel Bin (Cyclone #1)</u> Capacity: 10,000 scf/min
<u>Bark (Cyclone #12)</u> Capacity: 15,000 scf/min
<u>Shavings Bin (Cyclone #2)</u> Capacity: 18,500 scf/min 20,000 tons of shavings
<u>Planer Shavings (Cyclone #3)</u> Capacity: 23,276 scf/min 20,000 tons of shavings

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Source Description
<u>Trimmer Bin (Cyclone #4)</u> Capacity: 21,000 scf/min 20,000 tons of shavings
<u>Planer Chipper (Cyclone #5)</u> Capacity: 8,000 scf/min
#6 Trimmer Cyclone Exhaust is capped
<u>Shavings Bin (Cyclone #7)</u> Capacity: 7,200 scf/min 20,000 tons of shavings

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2. FACILITY-WIDE CONDITIONS***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
 - Application, where practical, of asphalt, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
 - Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
 - Paving of roadways and their maintenance in a clean condition, where practical; or
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall

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include, at a minimum, the date that each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed); any corrective action taken in response to the visible emissions; and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

Air Stagnation Advisory Days

- 2.11 The Permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 through 562.

Monitoring and Recordkeeping

- 2.12 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were

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performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.13 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422

Fax: (208) 769-1404

Obligation to Comply

- 2.14 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-Burning Equipment

- 2.15 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

Sulfur Content

- 2.16 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
 - ASTM Grade 2 fuel oil - 0.5% by weight.
- 2.17 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

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Cease Operations of Hogged Fuel Fired Boilers and Olivine Woodwaste Incinerator and Close #6 Trimmer Cyclone Exhaust

- 2.18 The seven hogged fuel fired boilers and Olivine Woodwaste Incinerator shall be rendered inoperable and shall not become operational until an air quality permit application has been submitted, and DEQ issues a permit that specifically allows the operation of the hogged fuel fired boilers and Olivine Woodwaste Incinerator. The exhaust of #6 Trimmer Cyclone shall remain capped until an air quality permit application has been submitted and DEQ issues a permit that specifically allows the removing of the cap.

Renovation/Demolition

- 2.19 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

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3. DRY KILNS/SAWMILL**3.1 Process Description**

The Sawmill is used to process logs into green lumber. The dry kilns are electrically heated dehumidification kilns. The overall dimensions of the dry kilns are 170 ft by 100 ft. The kiln system has two 30 inch by 30 inch vents, and four 24 inch by 24 inch vents. They are evenly spaced on the kiln roofs. The exhausted streams from these vents are combined through two ducts and discharged through two horizontal exhausting vents.

3.2 Control Description

The sawmill is indoors and has a dust pickup system. Emissions are controlled by the building and by cyclones. Emissions from the dry kilns are uncontrolled.

Table 3.1 DRY KILNS AND SAWMILL

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Sawmill	Indoor with pneumatic dust pickup	----
Dry kilns	None	2 horizontal vents

Emissions Limits**3.3 Emissions Limits**

Emissions of PM₁₀ and VOC from lumber dry kilns shall not exceed any corresponding emissions rate limits listed in the following table:

Table 3.2 DRY KILNS EMISSIONS LIMITS

Source	PM₁₀	VOC
Description	lb/day	T/yr
Dry kilns	6.84	67.5

Operating Requirements**3.4 Throughput Limits**

The sawmill shall not produce more than 90 million board feet of lumber per any consecutive 12-month period. The dry kiln shall not dry more than 90 million board feet of green lumber per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements**3.5 Throughput Monitoring**

The permittee shall monitor and record the monthly production of both the sawmill and the dry kilns. Each month, the permittee shall record the monthly production of both the sawmill and the dry kilns, and calculate and record the sawmill and dry kiln production for the most recent 12-month period. The most recent five years' compilation of data shall be kept onsite and shall be made available to DEQ representatives upon request.

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Reporting Requirements

- 3.6 The permittee shall report any exceedance of the sawmill and/or dry kilns production limits within five working days of the exceedance.

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4. WOOD BYPRODUCT BINS LOADOUT**4.1 Process Description**

Wood byproducts generated during the creation of dimensional lumber generally consist of bark, sawdust, chips and shavings. These byproducts are generally moved from place to place through either pneumatic devices or conveyors that deliver the byproduct to bins or trucks. Fugitive emissions are generated while the bins, or #5 Planer Chipper Cyclone, or #12 Bark Cyclone drops the wood byproduct into trucks. The wood byproduct bins consist of Fuel Bin Hog Fuel Storage (vertical tank bin), Fuel Bin Shavings (silo), Sawdust Bin, Chip Truck Bin, and Shavings Truck Bins.

Monitoring and Recordkeeping Requirements**4.2 Fugitive Emissions Monitoring**

During the first three months after permit issuance, the permittee shall conduct weekly inspections of fugitive emissions while the truck loadout system is operating, during daylight hours, and under normal operating conditions to ensure methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable.

The permittee shall maintain records of the results of each loadout inspection and any corrective actions taken. The records shall be kept onsite and shall be made available to DEQ representatives upon request.

After the first three months of weekly fugitive inspections and after all corrective actions have been taken to reasonably control fugitive dust from the truck bin loadout, the fugitive inspections may be conducted in accordance with Permit Condition 2.4.

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5. SUMMARY OF EMISSION RATE LIMITS

The allowable emissions table includes the emissions limits that the facility must demonstrate compliance with.

Table 5.1 SUMMARY OF EMISSION RATE LIMITS

Source Description/ Emissions Point	PM ₁₀	VOC
	lb/day	T/yr
Dry kilns	6.84	67.5

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6. TIER II PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
6. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.